

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-88-E**

IN RE:)	
Dominion Energy South Carolina,)	PETITION TO INTERVENE
Incorporated's 2021 Avoided Cost)	
Proceeding Pursuant to S.C. Code Ann.)	
Section 58-41-20(A))	
)	

On March 10, 2021, this Commission opened Docket 2021-88-E, relating to Dominion Energy South Carolina (“DESC”) in accordance with the provisions of the South Carolina Energy Freedom Act, S.C. Code Ann. § 58-41-10 *et seq.* (the “Act”). This Commission, at least once every twenty-four months, shall review and approve each electrical utility’s “...standard offer, avoided cost methodologies, form contract power purchase agreements, commitment to sell forms, and any other terms or conditions necessary to implement the terms of [the Act].” S.C. Code Ann. § 58-41-20(A)

Petitioner herein is the Carolinas Clean Energy Business Association, (“CCEBA” or “Petitioner”). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. CCEBA is a Mutual Benefit Corporation, incorporated in the State of North Carolina and domesticated to conduct business in the State of South Carolina by the South Carolina Secretary of State’s office.

2. CCEBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in North and South Carolina. CCEBA is a 501(c)(6) organization representing all types of businesses in the clean energy sector, including developers, manufacturing, engineering, construction, professional and financial services, and non-energy businesses wishing to purchase clean energy. With over 50 members, including most of the utility-scale solar developers in North and South Carolina, CCEBA monitors and participates in energy policymaking in both Carolinas. CCEBA has appeared as an intervenor in multiple dockets in North Carolina under its prior name: North Carolina Clean Energy Business Alliance. In South Carolina, CCEBA has assumed the role previously filled by the South Carolina Solar Business Alliance (“SCSBA”).

3. Specifically, CCEBA is a successor in interest for the SCSBA. CCEBA has been substituted as a Party in Interest in over two dozen Dockets of this Commission, by Commission Order No. 2021-167, dated March 10, 2021.

4. CCEBA's position is that CCEBA has substantial and specific economic interests in renewable energy in South Carolina and this Commission's actions thereon.

5. Factually, CCEBA will be directly and substantially affected by the outcome of this proceeding and CCEBA's business interests will be directly and financially impacted by this Commission's resolution of the subject matter of this Docket.

6. The grounds for this Petition are that Petitioner's interests cannot be adequately addressed by any other party. Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important decision to be made in this Docket.

7. Petitioner should be allowed to intervene in this Docket, with full rights of cross-examination, discovery and participation in any Hearing to be scheduled in this Docket.

8. The granting of CCEBA's Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

9. This Petition to Intervene is timely filed with this Commission.

10. CCEBA is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as this Commission may deem just and proper.

Respectfully Submitted,

/s/Richard L. Whitt

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*As Counsel for Petitioner, Carolinas Clean Energy
Business Association.*

April 20, 2021